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ABSTRACT

This booklet presents the positions of the National Association of Rehabilitation Facilities (NARF) on issues relating to supported employment in community settings and conversion of resources from previous programs for new applications. The booklet discusses NARF's previous statements, the legal basis for conversion of resources, proactive involvement, the philosophy of conversion resource allocation, risk containment in developing supported employment programs, planning for conversion, and decision ethics. Includes 15 references. (PB)

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NARF Monograph Series

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CONVERSION: RESTRUCTURING FOR INTEGRATED COMMUNITY PLACEMENT

December 1988

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CONVERSION: RESTRUCTURING FOR INTEGRATED COMMUNITY PLACEMENT

Foreword

Supported employment and other community-based employment options contribute to the lives of persons with disabilities through providing more normalized conditions, improved wages, more community participation, myriad opportunities, and enhanced status. Supported employment also has resulted in changes in public policy, funding negotiations, budgeting, costing, staffing, and operations of rehabilitation services. Transitioning into supported employment or expanding supported employment services is therefore often complex and demanding. It requires considerable planning and astute administrative timing.

The National Association of Rehabilitation Facilities has a long history of advocating for persons with disabilities. NARF has been instrumental in increasing funding for vocational services and in securing legislation and funding to support community based services including Projects With Industry and Supported Employment. NARF has also been concerned about the need for providing the necessary technical assistance to rehabilitation providers so that quality services will be implemented with quality results. This technical assistance has taken many forms, and includes seminars, newsletters, publications, and individual consultation.

NARF has promoted innovative rehabilitation practices because NARF is concerned about the quality of life for persons with disabilities. Rehabilitation providers, NARF's constituent base, also care about quality of life issues, including identification of work that meets individual needs, providing opportunities for choice decision making and working diligently to affect individual empowerment. Good wages, friendships, community involvement, and feeling valued have all been furthered in many ways by rehabilitation providers.

For those rehabilitation providers concerned with enhancing the status of individuals with severe disabilities, the rehabilitation issues, as we view them, involve the *whys, hows and when* of expanding community employment, including adding supported employment services. The issues also involve existing services and how they fit into a new service array, priority decision making, mission statements, values, and allocation of resources. This document, along with the accompanying monograph, *Quality of Life* (NARF, 1988) should provide a framework for thoughtful reflection and decision making.

CONVERSION: RESTRUCTURING FOR INTEGRATED COMMUNITY PLACEMENT

One of the most controversial issues related to implementation of supported employment, particularly from the viewpoint of facilities, is the concept of "conversion." On the one extreme are those advocates who suggest that all vocational activities can be completed in the community, with no need for rehabilitation facilities to continue "in-house" training efforts. At the other end are some rehabilitation providers who have no interest or desire in adding or expanding services to provide supported employment. Many are simply not convinced of the feasibility of supported employment and many are serving populations other than the "most severely handicapped." Such providers may be involved in working with persons injured in industrial or work-related accidents, persons with physical disabilities, or persons with other disabilities of such a nature that while rehabilitation services are needed, the long-term support of a job coach or twice-monthly monitoring may be unnecessary.

For many, if not most, vocational rehabilitation providers, supported employment is being seen as a viable and dynamic service option. Close examination of existing programs is occurring to facilitate the implementation of supported employment. Expansion into supported employment then proceeds in several ways. One common procedure which avoids the conversion issue is "adding on" supported employment without changing existing services. This is a desirable option for many providers; however, substantial funding of multiple programs with limited resources may not be practical over time.

Other professionals are promoting the diversion of resources from ongoing programs; however, diversion has its pitfalls. A key question which needs to be addressed is "diversion from what?". If ongoing services result in quality outcomes for persons with disabilities, diversion could jeopardize current habilitation efforts. On the other hand, some services may not meet the "outcomes" litmus test and may need to replaced with better, more effective services.

Another issue concerns whether or not diversion of resources will result in adequate services or is increased funding needed? Recent discussions support the probability of supported employment being at least as expensive as

sheltered workshops (Kendricks, 1988; Powell, 1988). One reason for this is that job coach services cannot always be permanently reduced as previously expected. Many supported employees follow employment trends representative of workers who are not disabled. These patterns include several job switches during initial employment periods as workers experiment and discover their job preferences. When discussing funding and resource allocation, cost consideration and needs must include provision for this normalized experience.

Conversion, therefore is not an "either/or" case of providing solely new services versus expanding to encompass supported employment. Conversion to provide effective and necessary resources may involve both expansion and diversion from ongoing programs, including particularly diversion from currently ineffective programs leading to"weak" outcomes (i.e., low wages, little integration, and insufficient empowerment).

NARF'S PREVIOUS STATEMENTS

NARF has addressed the implementation of supported employment publicly several times over the past few years, primarily as a legislative or policy issue. In January 1988, NARF commented as follows on proposed supported employment regulations:

> NARF still strongly believes that flexibility is needed for supported employment to realize its full potential, especially as it applies to Title I of the Rehabilitation Act...to place those same restrictions on Title I would unnecessarily restrict the potential growth of the utilization of supported employment for tens of thousands of persons with severe disabilities...NARF looks forward to working with OSERS, RSA, the state agencies, and our member rehabilitation facilities to develop and utilize supported employment techniques to provide as full a range of employment opportunities as possible to persons with severe disabilities.

Again in response to proposed regulations published in May 1988, NARF (July, 1988) commented:

> NARF's concern is that the concept of 'conversion' says that existing programs need to be changed from what they're doing to something else. This implies that what they are doing now is inferior to what they could be changed to. Conversion also implies that a complete change-over is necessary and that the new and existing programs cannot co-exist....

> ...*Webster's New Collegiate Dictionary* defines conversion as 'an expression associated with a definite and decisive adoption of religion' and to convert as 'to bring over from one belief, view, or party to another.' While NARF agrees that supported employment is a desirable and valuable rehabilitation outcome, it should not be looked on as the only, or necessarily most desirable, outcome...NARF believes that reference to 'conversion' of existing employment programs raises unwarranted and unneeded connotations that existing programs are not fulfilling identified needs or implies that they are doing a less than acceptable job...NARF suggests that Section 380.4(a)(4) and Sect. 380.6(d) be changed to read: 'development of supported employment as an alternative or addition to the existing array of programs.'

NARF has received feedback from facilities regarding conversion indicating that the implication that they are not providing quality services is strongly resented and should be forcefully refuted. Some facilities seem to believe that conversion is being mandated, that they will need to undergo major changes in both policy and implementation or rehabilitation services, and that this new structure is being thrust upon them with little or no opportunity for their input or consideration of the value of the services which they have delivered and are currently delivering. This document seeks to clarify that perception.

THE LEGAL BASIS FOR CONVERSION

The authority to proceed with planning for conversion is derived from Title VI-C, Sec. 634 of the 1986 Amendments to the 1973 Rehabilitation Act, which states that: "in order to be eligible for grants under this part, a State shall submit...under Title I of this Act, a State plan supplement for a three-year period for providing training and traditional time-limited post employment services leading to supported employment for individuals with severe handicaps."

From the Final Rules and Regulations published in the May 12, 1988 *Federal Register*, expansion is also authorized under 361.2(iii), the State Plan - General Requirements: "A description of the methods used to expand and improve services to those individuals who have the most severe handicaps, including individuals served under 34 CFR Part 363." Further detail concerning implementation can also be found in Title I, Section 101(5). (See Appendix A).

Specific procedures for determining the process for implementing conversion are spelled out in proposed regulations published in the *Federal Register* on May 3, 1988 (34 CFR Part 373):

> The purpose of Statewide supported employment demonstration projects is to convert existing Statewide programs of rehabilitation for individuals with severe handicaps to programs that offer supported employment services...(See Appendix A for the full text.)

Also authorized under these regulations were provisions for supported employment -- community-based projects to "develop innovative approaches and to improve and expand the delivery of supported employment services" and technical assistance to Supported Employment Projects.

Conversion as it is used in state planning and implementation of supported employment refers to reallotment of resources to a new priority area. The term is fundamentally accurate in its reflection of current activities at the state level. The term can also imply "total conversion" or "mandated conversion" -- suggesting that an ultimate goal may be 100% conversion.

In order to more fully understand how conversion is being implemented at the state level, NARF's supported employment staff has begun a review of state plans. A cursory review of some thirty state plans has occurred with a more indepth review of fifteen of the states most involved in supported employment (i.e., states with the longest history of involvement, high visibility, or states specifically where NARF members have expressed particular concern over the implementation of supported employment). No documents located thus far indicate that 100% conversion is intended.

The closest examples to such a statement were selected "goals" from the following states:

- Maryland: to serve 3,974 individuals under supported employment or 65% of those in sheltered workshops within five years, with additional increases occurring at the end of the five-year period.

- Virginia: to assist persons with disabilities who have vocational potential to become employed with 75% competitively employed; to change the predominant nature of day and vocational services in Virginia for persons with severe disabilities.

- Connecticut: a) to effect significant reduction in the number of persons served in segregated work activities centers, sheltered workshops and day activity centers (over five years); and, b) to foster integrated employment of approximately 4,000 persons with severe developmental disabilities.

As the previous examples indicate, there are many variations in planning of supported employment in the state plans. Some examples of selected "goals" that did not attempt to accomplish as much come from:

- Oregon: 38 of 156 slots may be converted into community-based supported work positions for persons with disabilities other than developmental disabilities or mental retardation during 1987-89.

- Illinois: During 1986 expect that 300 persons with severe developmental disabilities will be placed in community jobs.

- Georgia: During FY 1988 serve 150 clients with developmental disabilities in supported employment.

Many state plans did not have specific numbers as a part of their "goals", but were similar to the following:

- Alaska: to develop and expand existing supported employment programs.

- California: to obtain long-term funding.

- Michigan: to implement supported employment in four regions during 1986 with expansion to ten additional areas during 1987-88.

- Washington: to increase the number of DD eligible adults successfully placed by DVR into supported employment; with objectives to establish annual budgetary commitments and jointly plan and develop new supported employment programs.

These state plans will be revised with new state plans submitted to RSA in the Spring of 1989.

While state planning involves more than just VR activities, a closer examination of the planning processes used in states when drafting the plans indicates areas of possible concern and areas where facilities must be well apprised of VR planning activities and involved in such activities. Two areas where facilities should have a major chance to have an impact on policy planning are in the "state needs assessment", required under Sec. 634(A)(2) of Title VI-C, with reference to Title I; and under an area of "public participations" initially "permitted" under Sec. 363.5 (May, 1987) and later mandated under final

regulations on public participation from the August 14, 1987 *Federal Register* 34 CFR.

> States that have planning grants are required, rather than authorized to seek public participation in developing a State plan for supported employment services (p. 30548).

The preliminary review of VR state plans indicates that there has been a wide variance state to state in both public participation and the actual needs assessments. In some states, public announcements of forums resulted in "zero" attendance; in others, concerns of the rehabilitation facilities were documented along with "reasonable" responses by VR agencies. In the area of needs assessments, detailed and relevant assessments were undertaken in some states. Other states relied primarily upon incident figures; in yet other states, needs assessments were more generic with information extrapolated for supported employment.

Of course agencies other than VR are involved in planning for supported employment. State MR, DD and MH agencies play major roles in the provision of follow-along services. NARF is currently investigating their involvement and planning, and recommends that its members keep up-to-date on activities in their states as well.

One other area of Title VI-C also may provide some authority for facilities to demand their involvement in supported employment and planning for supported employment. Sec. 634(b)(2)(F) states that: "the States will make maximum use of services from public agencies, private nonprofit agencies, and other appropriate resources in the community to carry out this part."

PROACTIVE INVOLVEMENT

NARF strongly urges community rehabilitation providers to avail themselves of all opportunities to provide input into state decision making. In so doing, state ARF Chapters can be a tremendous resource. Many of the Chapters are all ready involved in planning and are a part of the state advisory councils that are preparing supported employment goals. NARF also advocates:

- Meaningful involvement of rehabilitation facilities, employees with disabilities, and their parents and guardians in public forums to discuss state plans for conversions.

- Comprehensive statewide needs assessments for planning for supported employment conducted prior to imple-mentation of goal setting.
- Involvement of rehabilitation facilities with supported employment planning and implementation be to "the maximum extent possible."

NARF has met with, and will continue to meet with, government officials to review policies and procedures in these areas, to voice concerns regarding practices in individual states and to begin to formulate some provisions for adequate planning and public participation.

CONVERSION FROM A PHILOSOPHICAL PERSPECTIVE

Conversion to supported employment is advocated by many researchers, public officials, parents, and others based upon the "quality of life issues" addressed by these groups. Research has been undertaken which purports that supported employment:

- Is "less costly" than services provided by work activity or day activity centers (Nobel & Conley, 1987).

- Results in better wages and thereby increases the quality of life of employees with disabilities (Wehman & Moon, 1988; Hill, Banks, Handrich, Wehman, Hill & Shafer, 1987).

- Results in more community participation and integration (Bellamy, Rhodes, Mank & Albin, 1988).

- Reduces the stigma of being handicapped (Wehman & Moon, 1988).

Supported employment by increasing wages, participation in the community, and daily association with non-disabled employees has been beneficial in removing barriers which have kept persons with disabilities in that class of citizens without full privileges. In the past, persons with disabilities have been segregated, permitted to work under a set of conditions greatly different than for nondisabled persons and overregulated (e.g., meals, bedtime, leisure activities and privacy issues). Recent efforts across the United States are resulting in substantial improvement.

Along with the community living movement, supported employment has resulted in a new framework for considering the dignity and rights of persons with disabilities. This is not to say that "supported employment alone" has produced these changes. Additionally, research studies showing the costs and

benefits of supported employment, while providing useful information, have not taken into account the actual costs providers incur in operating supported employment programs. More recent speculations suggest that "supported employment" may at a minimum be more costly than originally anticipated and perhaps supported employment may even be more costly than traditional sheltered employment.

Historically, facilities also have been active in securing better living and working conditions for employees. Many programs around the country placed employees with disabilities in community settings in mobile work crews, enclaves, and in transitional employment programs even before funding was available for supported employment. Many innovative community programs were developed and implemented by facilities (Campbell, 1988).

Facilities have not been research institutions but rather they have been on the front line, providing services. The basic mission of facilities is to respond to market needs and to meet consumer concerns while improving the lives of adults with disabilities. Over the years, facilities have woven together funding patterns and explored a variety of resources to find multiple funding sources to support needed programs and to locate the choice of work that meets individual needs.

Facility staff have also been interested in the social life and community access and involvement of persons with disabilities. Facilities have collaborated with residential providers and case managers to improve the overall quality of life of the persons they have served. The current focus on supported employment, and more importantly, the desired outcomes: better wages, more benefits, greater acceptance and empowerment, necessitates thoughtful reflection on mission statements, values, and improved opportunities. Rehabilitation facilities, with their long history of advocacy and service provision, are engaging in this thoughtful consideration. Mission statements are being rewritten and policies changed to take better advantage of increased opportunities and to highlight community involvement and opportunities for persons with the most severe disabilities.

From a philosophical perspective then, pursuing enhancement of quality of life and quality for work for persons with disabilities must be the cornerstone of rehabilitation efforts. NARF continues to support this precept and to the extent supported employment and conversion contribute to these sound values, they are also valued. However, a concern is whether the enthusiasm for supported employment will lead to the elimination of other needed services or the creation of other "forgotten populations." For these reasons, NARF's

perspective is that supported employment with conversion of resources needs to be utilized to the extent that it enhances the lives of persons needing assistance and to the extent that it provides for more efficient and effective service delivery.

However, rather than force all valued programs to fit into the "supported employment mode" (especially with its somewhat arbitrary regulations), NARF advocates for the advancement of "community employment options" for persons with disabilities. States are planning some redirection of funding for supported employment -- NARF is in general agreement with that principle. However, NARF encourages state decision-makers to look at all sources of state and federal funds when considering conversion. NARF also continues to support maintaining all viable options that lead to good outcomes and NARF is not supportive of any funding revisions that lead to the exclusion of effective and needed programs.

NARF is investigating state planning for supported employment. A major determinant of NARF's stance on conversion will be the percentage of resources allocated to conversion.

RESOUCE ALLOCATION

For those organizations considering resource allocation and conversion, the planing process should estimate the percentage of people employed in sheltered programs and the percentage of persons in day activity programs who could participate in and benefit from supported employment. A *second* consideration involves the estimation of resources needed to maintain ongoing quality programs which result in good wages and community participation for persons with disabilities. This could involve PWI projects, NISH contracts, transitional programs, and programs which result in community employment but do not meet the restrictive federal guidelines of supported employment.

A *third* consideration should be the need to maintain certain ongoing programs within facilities. This involves programs for people who choose to remain in work/day activity. A percentage of these persons will be individuals who have been placed unsuccessfully in supported employment programs. Some of these persons may need temporary instruction in a more controlled work environment, others' needs may be best met through ongoing employment in a facility environment. A part of this consideration is the need for some supervision and even, perhaps, additional employment opportunities for individuals who are unable to work full-time in supported employment.

As supported employment proceeds, at some future date the field also will become better at predicting which individuals may be inappropriately placed in supported employment. It is reasonable to assume that a certain proportion of those individuals employed in facilities will be there because of their disabilities. Some ongoing facility programs, with their capabilities for continual supervision and their understanding of behavior extremes and individual differences, are probably the "best fit" for a certain portion of persons with disabilities. Realistically, it needs to be recognized that some persons with severe deficits in socially appropriate behavior, serious problems with sexually inappropriate behaviors, and extreme cognitive limitations may not "make it", at least for now, in the world at large. *NARF supports facilities in their efforts to explore innovative programming to meet these challenges.*

Therefore, adequate resources will be needed to serve individuals who may not be placed in supported employment. Innovative facility programs may provide the types of work experiences and the supervision that best meet the needs of particular individuals. Resources should remain for people who decide to obtain services from homogeneous environments.

Some of these persons, persons for whom "work" may be an inappropriate goal, also may be best served in day activity (nonwork) programs, including programs with a focus on social skills and leisure development. That also should be considered. In so doing, however, it is critical that adequate consideration be given to attempting the philosophy of "zero reject" (Wehman & Moon, 1988) and that individuals with severe disabilities be given opportunities to work with supervision in the community.

Funding for evaluation, vocational counseling, "work hardening" and other traditional rehabilitation programs which are effective and which assist with quality assurance is a *fourth* consideration. Some 50-60% of persons served in community-based facilities are severely handicapped (Bellamy, Manks, Rhodes, & Albin, 1988). This suggests that even if most of those individuals could be placed into supported employment as recommended by some advocates (McLoughlin, Garner & Callahan, 1988), additional resources are needed for maintaining other ongoing programs.

A *fifth* concern is related to "conversion as a process," including the length of time necessary to develop comprehensive rehabilitation services and the safeguards of maintaining some ongoing mechanism to provide for possible needs, such as fallbacks for problems which may arise with supported employment. Potential problems include: employment during times of increasing high unemployment, changes in the economy, the impact of

technological advances and the concomitant changes in industrial and service sector employment, and changes in the workforce, including the sudden availability of additional workers from other labor pools.

SUPPORTED EMPLOYMENT VERSUS CONVERSION

NARF'S position on supported employment and conversion are not synonymous. While NARF was instrumental in affecting the passage of legislation authorizing supported employment (the Rehabilitation Amendments of 1986), NARF originally was established as an organization representing rehabilitation facilities. While community integrated employment is valued highly, NARF has an obligation to consider the needs of the employee who is disabled, his/her parents and guardians, and the service provider. The history of supported employment over the last eight years (Wehman & Moon, 1988) is such that NARF is confident that supported employment can be implemented with few risks to agencies, families or individuals. Conversion, however, due to the magnitude of the inherent change and its impact on more persons presents additional risks to each of these groups.

Conversion also has the potential for greater risks due to the nature of timing for conversion. Rehabilitation programs typically enter into supported employment somewhat cautiously, taking time to construct the best fit between employer needs and available supported employees. Often persons with greater capabilities are initially placed in supported employment to assist with the establishment of relationships with employers and to provide the foundation for trust and credibility which will facilitate later supported employment of persons with more severe disabilities.

As rehabilitation providers become familiar with supported employment and learn to trust their capability to provide effective services, they also become more comfortable with taking risks and expanding the supported employee workforce. Typically at the time programs expand, more job coaches and individual placement specialists are hired, and a greater percentage of program resources are allocated to supported employment. All of this presents additional risks as well as increased opportunities. Facilities need to therefore engage in careful "risk planning" and "risk containment" in terms of making the best possible decisions under conditions of increased risks.

Principles that hold true for limited implementation of supported employment therefore are not necessarily true for larger scale conversion. Identifying good job matches and providing well-trained personnel to assist with supported employment are current activities of many, and perhaps even most

rehabilitation facilities (NARF, in press). The expense of running dual programs is also a driving force behind closer examination of conversion. With larger scale conversion, careful planning and timing of expansion are critical and require considerably more of administrators than occurs with only the addition of some supported employment activities (Gardner, Chapman, Donaldson & Jacobson, 1988).

PLANNING FOR CONVERSION

Facilities interested in larger scale conversion will find resources and support from NARF, just as facilities interested in transitional programming, medical services, or work adjustment will find NARF to be a reliable resource. From NARF's current knowledge, specific issues that should be considered in planning for conversion include:

- The needs and the best quality programs for the individual with disabilities.

- The attitudes of parents and guardians. Parents who have been involved in the PL 94-142 era tend to be interested in community integrated employment. That market will motivate some expansion to supported employment. Conversely, those parents who gathered resources to build facilities and facility programs are more likely to be hesitant and even quite resistant to supported employment. Facilities have an obligation to share information with parents, including the pros and cons of supported employment, and then, rather than leave parents hanging and failing to provide services that parents have learned to count on, to continue to provide those services, even as changes are occurring within the rehabilitation program.

- The potential risks and unresolved issues: long-term funding, loss of SSI or SSDI benefits, unemployment, and transportation needs.

- The desirability of community employment outcomes: wages, integration, and "valued status" even with the potential risks.

- The management and success of ongoing operations -- an industrial orientation. Facilities that are successful with business contracts or manufacturing may find that from a strictly business perspective they are motivated to maintain current operations. Some facilities have learned to generate significant income from their corporate side and in turn to utilize that income for funding human service activities. If conversion results in redirection of operations, facilities need to consider

how to remain financially solvent and offer high quality services while relying less on this corporate income. Facilities also need to reexamine their mission statements and make sure that whatever action they take is in the best interests of the persons they serve.

- The need to provide services based on a strong value systems -- systems which place primary emphasis on the value of work in enriching lives for persons with disabilities. In the past "rehabilitation" included a variety of activities, work was viewed as therapeutic, and other activities also were considered to have "rehabilitative value." Recent efforts demonstrate the efficacy of focusing on work, integration, and better wages. When examining underlying values, mission statements also need to be examined and often to be modified to reflect this current belief in the value of work.

- The difficulties in implementing change and resistance to change -- resistance from staff, board of directors, parents, potential supported employees, and employers.

- Strategies for gaining acceptance of supported employment.

- Time frames and the complexities of reorganization, staff turnover, and staff training.

- Adequate costing and funding of supported employment activities, including an examination of the costs involved in operating dual services (i.e., supported employment and facility programs). Several organizations currently are providing assistance in this area, including: NARF, Cornell University, and Maryland's Supported Employment Project operated through the Johns Hopkins University.

  A part of this consideration needs to be how to renegotiate current contracts with funders to reflect changes in service delivery and to ensure that if a new contract with a different funding structure is required, that such a contract is obtained.

- The types of supported employment models and the combination thereof that will best meet the needs of the employees and the organization. Many organizations are finding that some combination of the individual placement, enclave and mobile work crew works best (NARF, in press). Other organizations, particularly in rural areas, are establishing small entrepreneurial businesses.

- Procedures for implementing conversion and addressing the issues of part time employment or service provision during times of unemployment (many supported employees are employed 20 hours a week or less). Some conversion advocates suggest that it may be best for supported employees who work less than full time to spend the remainder of their time at home. Residential service providers often do not have staff available and many employees with severe disabilities need supervision. Many parents and guardians, as well as advocates, are quite concerned over this "stay at home" proposition.

- Evaluative procedures for weighing the merits of supported employment against other types of employment such as the state and federal government contracts where wages and benefits are regulated and are comparable to industry's wages (often ranging from $6-9/hr.). Procedures should ensure that states are considering these alternatives programs as they establish "conversion" goals.

DECISION ETHICS

Facilities, in determining their stance on supported employment and conversion, need to evaluate their positions carefully. A recent critique of facilities in a text by Marc Gold's cohorts and based on many of his successes and beliefs (McLoughlin, Garner & Callahan, 1988) makes the following statements:

- McLoughlin et al.: In reference to statements by many facilities that there is a need for a safety net: "The continued existence of sheltered workshop environments creates a situation in which there is no urgency to teach persons with severe disabilities to perform functional, productive, and marketable skills. The safety net is always there for our training facilities" (p.5).

  NARF Response: When individuals who have been employed in the community return to facility programs for retraining, facilities often provide this training without receiving additional funding. Hence, facilities are not "gaining" anything by suggesting the need for safety nets. Rather, facilities are being responsible and protecting the best interests of the persons they serve, often at financial loss.

  Safety nets should not stand in the way of community integrated services or be vehicles for maintaining services that are not most appropriate to individual needs.

- McLoughlin et al.: Consideration needs to be made of the possible consequences of not providing community employment and its provision for higher wages for individuals with severe disabilities versus attempting such employment and finding out that the employee can not operate in the community. In other words, facilities need to evaluate the results for the individual of trying community employment and finding that it does not work, versus never giving an individual a chance, and later discovering he/she was capable.

  NARF Response: One question to ask might be: "If I myself could possibly enhance my life by working in the community, would I want to be employed in a sheltered program instead?"

  It is important to separate current from historic practices. Current funding resources and ideology are structured to facilitate community employment, with Job Training Partnership Act, Developmental Disabilities, Projects with Industry, and Supported Employment funds now available to encourage such community placements. Rehabilitation programs are taking advantage of these funds, as well as using other internal resources, to promote community placements.

- McLoughlin et al.: Workshops face the never ending dilemma of production versus placement. Employees who may be capable of other work are sometimes used to help meet production quotas. Can this be justified?

  NARF Response: Facilities need to examine their mission statements and their practices. NARF does not advocate such practices.

- McLoughlin et al.: What is the effect of working with outdated materials and supplies and makeshift conditions? Do such conditions best prepare individuals for employment in sites with sophisticated equipment and machinery? Are the task really comparable?

  NARF Response: Facilities vary widely in the equipment and technology utilized. These are valid questions and it should not be assumed that all facilities follow such practices. Many facilities operate successful business ventures with up-to-date technology and practices.

- McLoughlin et al.: "Sheltered workshops may have once served a valuable purpose. However, the time has come to step forward and take

very seriously our obligations to enhance the limited range of expectations held by many professionals."

NARF Response: Rehabilitation facilities encompass much more than sheltered workshops, including transitional employment services, Projects with Industry, and an array of support services including case management, leisure and recreation, transportation, evaluation and counseling services. Many facilities now are offering services to people without disabilities, working on many fronts to integrate programs and utilize best practices. The time has come to stop assuming that facilities place limitation on the people they serve. The time has also come to recognize that facilities are working diligently for the best possible employment outcomes within the constraints of the available resources.

NARF's overall response to these claims is that such conditions are not advocated by NARF and that such statements don't acknowledge the vital role that facilities have played and continue to play in obtaining important employment outcomes. Many facilities are providing exemplary services where quality is important. While one may find examples to support the arguments of McLoughlin et al., the examples are not the norm. The overgeneralizations made by McLoughlin et al. diminish the credibility of an otherwise valuable text.

The *Code of Ethics of the National Association of Rehabilitation Facilities: Vocational Rehabilitation Facilities* (1981) also supports the emphasis NARF and the rehabilitation field has placed on quality outcomes for individuals:

> The primary mission of the rehabilitation facility is to assist handicapped individuals in developing an optimum level of social, vocational and economic independence in their community...the rehabilitation facility recognizes the ultimate goal of handicapped persons of achieving self sufficiency through gainful employment...."

This code was in step with the times in 1981 and remains a firm foundation for today's practices.

Commitment of programs serving the vocational needs of persons with disabilities is not the issue. However, the avenues chosen to maximize the potential of every individual served must be reevaluated. Organizations deciding not to engage in supported employment must decide on the basis of beneficial outcomes for the clients, and promote the value of their services and

support that with data rather than being merely "against supported employment or against change". Change is occurring for many segments of our society and businesses must be responsive to the need for change or face the consequences (Peters, 1988). Rehabilitation providers must also be responsive.

NARF'S POSITION ON CONVERSION

NARF has provided this paper as a service to its members, to assist them in decision making and planning. When considering policy directions, any position NARF takes on conversion should recognize:

1. The need for NARF to be well informed and to educate its member through the dissemination of critical information, including white papers, monographs, technical assistance, newsletters, seminars, and the full range of support services. NARF is also planning financial costing seminars and a variety of activities to continue to get the needed information to its members.

2. The need to focus on quality of life issues and obtaining the best possible employment outcomes. *This includes the need for rehabilitation facilities to play an instrumental role in promoting quality of life and empowerment of the consumers they serve as they design and implement the services they choose to provide for people with disabilities.*

3. The responsibility to provide support for facilities with diverse needs and interests.

4. The effectiveness of proceeding from a consideration of "quality service provision" and the dangers inherent in appearing to be self-serving or placing the interests of the agency ahead of the needs of the individual.

5. That current federal regulations are restrictive and many quality community-based programs are operating which do not meet the strict federal guidelines.

6. Facilities are the primary providers of supported employment and have existing services, ongoing community contacts, and business expertise which facilitate successful supported employment.

APPENDIX A

Title I. Sec. 101(5) State Plans:

"(5)(A)...contain the plans, policies and methods to be followed in carrying out the State plan and its administration and supervision, including the results of a comprehensive Statewide assessment of the rehabilitation needs of individuals with severe handicaps...and the State's response to the assessment, a description of the method to be used to expand and improve the services to individuals with the most severe handicaps including individuals served under Part C of Title VI of this Act, and a description of the method to be used to utilize existing rehabilitation facilities to the maximum extent feasible."

May 3, 1988 *Federal Register* (34 CFR 373):

"The purpose of Statewide supported employment demonstration projects is to convert existing Statewide programs of rehabilitation for individuals with severe handicaps to programs that offer supported employment services. Grant funds are to be spent for the costs of program development and reorganization, staff training, and evaluation. While grant recipients must also provide, or ensure the provision of, direct services to individuals, grant funds cannot be used for this purpose."

and from 380.4

"What activities may the Secretary fund under Statewide Supported Employment demonstration projects? (1) Program development, including program start-up costs, for new or existing community organizations and employers; (2) staff training; (3) program evaluation; (4) program reorganization to convert existing programs to programs that offer supported employment services; (B) Restrictions:...can not be used to provide supported employment services to individuals with severe handicaps.

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